

Region 3 GPRA 2020 Baseline RCRA Corrective Action Facility

DuPont Performance Coatings, Inc.

**7961 Winchester Road
Front Royal, VA 22630
Congressional District 10
EPA ID Number: VAD980554539
Last Updated: 01/08/2009**

Current RCRA CA Activities

The EPA has delegated the Virginia Department of Environmental Quality (DEQ) as the lead agency for oversight of Corrective Action (CA) at the DuPont Performance Coatings, Front Royal, VA facility (DuPont Front Royal) under the Resource Conservation and Recovery Act.

The DuPont facility site is on the RCRA CA 2020 GPRA Baseline Universe List (2020 CA Universe List) and was ranked as a low priority site under the National Corrective Action Prioritization System (NCAPS).

In Virginia, the EPA and the Virginia Department of Environmental Quality (DEQ) are conducting CA site assessments and evaluations of facilities on the 2020 CA Universe List, which were ranked medium, low, or unranked under NCAPS. The facility site assessments and evaluations are being conducted with primary assistance from an EPA contracted consultant. The evaluations and findings in the CA site assessment are documented in a Final RCRA CA Site Visit Report for the subject facility.

The facility specific Final CA Site Visit Report is essentially a Phase I Site Assessment Report, which includes facility information documented from the site visits, site meetings, and the administrative record established from file searches of the DEQ's Central Office, Office of Hazardous Waste (OHW) files, the DEQ's Regional Office files (all media), and the EPA's RCRA files or records.

The Final CA Site Visit Report provides an inventory of a facility's Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), a preliminary assessment of the SWMUs and AOCs based upon the evaluation and findings of the researched administrative record, the site visit, engineered controls, available environmental data, waste characteristics, the past regulatory oversight of operations and closure of SWMUs and AOCs, and the perceived potential risk to human health and the environment posed by the facility from actual or potential releases of hazardous waste or hazardous constituents to the environment, potential migration pathways, potential target receptors, etc.

In Virginia, the Final CA Site Visit Report will be a primary basis to determine if many of the facilities on the 2020 CA Universe List will need a CA investigation to assess potential releases of hazardous waste or hazardous constituents from the facility's SWMUs or AOCs or if the EPA and the DEQ may recommended No-further Action (NFA) for CA for the site under the RCRA Regulations.

On September 7, 2006, a CA site visit was performed by the EPA, the DEQ, the EPA contracted consultant, and representatives of DuPont to assess and evaluate the facility regarding the potential need for CA.

On March 12, 2007, a Final RCRA CA Site Visit Report, dated March 2007, was submitted to the EPA and DEQ, by Tetra Tech EC, Inc.

A final decision or determination of whether CA is complete for the facility will be made by the DEQ based upon evaluation of environmental data at the site.

Site Description

The DuPont Front Royal facility is located at 7961 Winchester Road, Front Royal, Warren County, Virginia. The site is located in a rural agricultural/residential and light commercial area. DuPont Front Royal is a relatively new facility as construction was completed in 1981. Prior to construction the property had been utilized for agricultural purposes. The facility currently employs approximately 400 individuals and operates a 24 hour per day 7 day per week batch process to manufacture solvent and water based industrial finishes, maintenance and automotive finishes, and resin polymer finishes. These products are manufactured, packaged and warehoused onsite prior to shipment. The facility layout includes an office area, two story manufacturing area, and a packaging/warehouse location.

While no new product lines contain lead or chromium, historically the site has and still manufactures lead based products. Corporate goals for the facility estimate 20.5 million gallons of manufactured products for 2006. The facility is categorized as a Large Quantity Generator of Hazardous Waste. Since the facility was issued a Hazardous Waste Management Permit, operations are subject to RCRA corrective action. In 1996, Clean Closure was granted for certain hazardous waste management units (HWMUs) at the facility. The majority of wastes generated at the facility are solvent still bottoms. Distilled solvents are reused with the still bottoms being shipped off-site to a RCRA regulated treatment, storage, and disposal (TSD) facility for treatment as hazardous wastes.

The facility ships process wastewater offsite for treatment, and therefore does not discharge industrial wastewater. Domestic wastewater is treated at the publicly owned treatment works (POTW). The plant does not have any surface water discharges, and; therefore is not required to maintain a National Pollutant Discharge Elimination System (NPDES) or Virginia Pollutant Discharge Elimination System (VPDES) permit. The only permit the facility has maintained is a Title V Air Permit which has been replaced effective December 8, 2006, with a synthetic Minor Operating Air Permit as a result of the installation of a thermal oxidizer to effectively control volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) emissions.

In 1996, the RCRA Part B Permit the facility had maintained was not renewed as a result of “clean closure” of the previously permitted HWMUs. All previously permitted HWMUs, which have been “clean closed” are currently operated as less than 90-day hazardous waste accumulation areas in accordance with the RCRA Regulations under 40 CFR § 262.34, Accumulation time.

The plant relies on natural gas as the primary fuel source; however an onsite secondary fuel source of fuel oil is present. DuPont Front Royal operates a 100,000-gallon aboveground storage tank (AST) that has been in place since plant startup in 1981. The AST fuel oil tank is surrounded by five (5), 35-50-foot deep vapor wells that penetrate into bedrock for monitoring. Facility representatives have stated that vapors have never been detected in the wells used to monitor this tank.

The plant utilizes local municipal potable water; however, some of the surrounding residents may still utilize wells for potable water. The distance to closest property line (to the center of the facility) is approximately 540 feet.

The facility was constructed in a manner that did not place any product lines underground. The facility was built with each building having containment measures, including trench drains. An on-site spill basin allows for the detention of liquids for testing prior to on-site surface discharge.

Stormwater is surface discharged on-site through a gate-controlled outfall. The entire facility is built on a grade that provides for secondary containment with an earthen dam. It is believed that operations have remained relatively consistent throughout the entire history of this site.

RCRA CA Milestones

To date, the following Resource Conservation and Recovery Act (RCRA) CA milestones have been completed at this facility:

- November 18, 1980 – Hazardous Waste Permit Application submitted to EPA.
- January 9, 1981 – EPA letter acknowledging receipt of Application of a Hazardous Waste Permit.
- August 24, 1981 – Letter From DuPont, Front Royal to EPA discussing the classification of hazardous paint waste in the application for a hazardous waste permit.
- February 18, 1984 – Hazardous Waste Permit Application – General Information Form.
- July 15, 1985 – Fact Sheet for Hazardous Waste Storage Permit.
- August 5, 1985 – Facility Management Plan for DuPont Front Royal.
- January 28, 1986 – Letter from Commonwealth of Virginia to EPA indicating an enclosed draft Permit for DuPont Front Royal.
- March 11, 1986 – Letter from Department of Health, Commonwealth of Virginia to USEPA indicating an enclosed finalized copy of the fact sheet for DuPont Front Royal.

- June 30, 1986 – Letter from Virginia Department of Waste Management to DuPont Front Royal. Enclosed with a letter is the state’s Hazardous Waste Management Permit for DuPont effective from June 30, 1986 through June 29, 1996.
- December 5, 1986 – Letter from EPA to DuPont, Front Royal issuing an enclosed Permit for the DuPont Front Royal Facility to operate from December 5, 1986 through December 4, 1996.
- November 5, 1990 – Letter from DuPont, Front Royal to EPA notifying of Regulated Waste Activity with attached Hazardous Waste Permit Application Part A).
- August 26, 1994 – Department of Environmental Quality Waste Division Checklist for Hazardous Waste Inspection of Large Quantity Generators (DuPont Front Royal Checklist for Hazardous Waste Inspection of Large Quantity Generators).
- January 11, 1995 – Letter from DuPont, Front Royal to Virginia Department of Environmental Quality (DEQ) discussing the closure process by which DuPont Front Royal would switch from a permitted facility to facility operating under a generator status.
- September 26, 1995 – Letter from DuPont Front Royal to DEQ requesting a Minor Modification to Hazardous Waste Permit VAD980554539.
- January 29, 1996 – Department of Environmental Quality Waste Division Survey Sheet for Inspection of Hazardous Waste Facilities for DuPont, Front Royal.
- February 22, 1996 – Letter from the DEQ to DuPont Facility discussing closure of hazardous waste tanks.
- July 25, 1996 – Letter from the DEQ to the DuPont Facility regarding minor Permit Modification, DuPont Front Royal Facility EPA ID#:VAD980554539.
- August 29, 1996 – Letter from the DEQ to DuPont, Front Royal indicating that on August 28, 1996, “clean closure” of the permitted hazardous waste pads #1 and #3 had been achieved in accordance with the modified closure plan approved on July 25, 1996, following inspection.
- November 5, 1996 – Warren Engineering provided engineering certification for Hazardous Waste Storage Container facilities at DuPont Front Royal for Tank No. 5101 and 5103.
- November 7, 1996 – Letter from the DEQ to DuPont, Front Royal indicating that hazardous waste tanks #5101 and #5103 have been approved for “clean closure” on November 6, 1996, following inspection.
- November 14, 1996 – Warren Engineering provided engineering certification for Hazardous Waste Storage Container facilities at DuPont, Front Royal for Tank No. 5102 and 5104.
- November 18, 1996 – Letter from the DEQ to DuPont, Front Royal indicating that hazardous waste tanks #5102 and #5104 have been approved for “clean closure” on November 18, 1996, following inspection.

- November 26, 1996 – Letter from the DEQ to DuPont, Front Royal indicating that on November 26, 1996, “clean closure” of the permitted hazardous waste pad #2 has been achieved in accordance with the modified closure plan approved on July 25, 1996 following inspection.
- November 26, 1996 Letter from DuPont, Front Royal to the DEQ documenting that DuPont has successfully “clean closed” Hazardous Waste Storage Tanks 5101, 5102, 5103 and 5104 as well as Pads #1, #2, and #3. Engineering certification provided by Warren Engineering was enclosed with the letter.

Details and the supporting documentation regarding the above can be obtained by reviewing the files at DEQ’s Central Office or by contacting the project managers identified in this fact sheet.

Environmental Indicator Status

Under the Government Performance and Results Act (GPRA), the Environmental Protection Agency set national goals to address high priority RCRA CA facilities by the year 2008 and medium/low facilities by 2020. The EPA is evaluating two key indicators for each facility: *Current Human Exposures Under Control* and *Migration of Contaminated Groundwater Under Control*. The Facility is a low priority site and falls under this GPRA initiative.

The current Environmental Indicator Status for this facility is:

- *Human Exposures Controlled Determination:* The DEQ has not yet made an EI determination for the Facility.
- *Release to Groundwater Controlled Determination:* The DEQ has not yet made the EI determination for the facility.

Contaminants

No contaminants have been identified in the soil or groundwater pending investigation of the SWMUs and AOCs.

Institutional Controls

There are currently no institutional controls in place at this facility.

Community Involvement

Citizens' questions and concerns may be directed to the contact below. Also, the Administrative Record which contains all documents and information regarding the RCRA CA program for this facility are available for public review at the following location(s):

Virginia Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219

Government Contacts

DEQ Project Manager

Ms. Angela Alonso
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EPA Project Manager

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For more information about EPA's CA program, including Environmental Indicators, please visit EPA's website at: www.epa.gov/reg3wcmd/correctiveaction.htm.

Facility Contact

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Fact Sheet Update

The next fact sheet update is scheduled for July 2009.